

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHELLE TEXIER,

Plaintiff,

-against-

CAMPUS EYE GROUP ASC, LLC;
CAMPUS EYE GROUP ASC, P.C.;
CAMPUS EYE GROUP, LLC;
PATRICIA DELANEY (In Her
Individual and Official Capacity);
PAMELA TODD (In Her Individual and
Official Capacity); and DENISE
AGNESS (In Her Individual and Official
Capacity),

Defendants.

Civil Action No. 3:19-cv-21644-FLW-
DEA

**STIPULATION OF THE PARTIES AND CONSENT ORDER EXTENDING
DISCOVERY DEADLINES**

And now, this _____ day of _____, 202____, Plaintiff Michelle Texier,
Defendant Campus Eye Group ASC, LLC, Defendant Campus Eye Group ASC, PC, Defendant
Campus Eye Group, LLC, and Defendant Pamela Todd, by their undersigned counsel, stipulate
as follows:

1. The parties will have an additional 14 days to respond to all previously served discovery requests;
2. Defendant Pamela Todd's deposition may be held on a date later than the currently proposed date of January 26, 2021, if needed and requested by her counsel; and
3. The deadlines set forth in the Scheduling Order in this matter, which was entered on October 15, 2021, following a pretrial conference pursuant to Rule 16, Federal Rules of Civil Procedure, shall be extended as follows:
 - a. Motions to amend or to add parties to be filed by: January 7, 2021

- b. Factual discovery to be completed by: April 23, 2021
- c. Plaintiff's expert report due on: March 14, 2021
- d. Defendant's expert report due on: June 11, 2021
- e. Expert depositions to be completed by: June 25, 2021

4. No previous extensions have been requested or granted for any party.

/s/ Catherine W. Smith, Esq.
Catherine W. Smith, Esq.
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/s/ Jeffrey Downs, Esq.
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/s/ Meghan N. O'Brien, Esq.
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Attorneys for Defendants Campus Eye
Group ASC, LLC, Campus Eye Group
ASC, PC, and Campus Eye Group, LLC,

SO ORDERED:

J.

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